

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA :
:
v. :
: No. 4:22-CR-361
DANIEL PICCA, :
:
Defendant. : (Chief Judge Brann)

**REQUEST FOR PRE-TRIAL DISCLOSURE OF
HEARSAY STATEMENTS PURSUANT TO FED. R. EVID. 807**

Defendant Daniel Picca, by and through his undersigned counsel, respectfully requests from the Government pre-trial disclosure of any and all possible hearsay statement(s) as a residual exception to the hearsay rule pursuant to Fed. R. Evid. 807 which the Government may seek to introduce at trial.

The disclosure should include the content of the hearsay statement(s), and the identity and address of the declarant.

Dated: October 31, 2022

MIELE & RYMSZA, P.C.

By: s/ Edward J. Rymsza
Edward J. Rymsza, Esq.
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CERTIFICATE OF SERVICE

I, Edward J. Rymsza, Esq., hereby certify that on this 31st day of October 2022, I served the foregoing Request for Pre-trial Disclosure of Hearsay Statements Pursuant to Fed. R. Evid. 807 upon Geoff MacArthur, Esq. by electronic mail.

Dated: October 31, 2022

MIELE & RYMSZA, P.C.

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